

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

MAUREEN PIEKANSKI

*Plaintiff,*

v.

ALEX M. AZAR II, in his official capacity as Secretary of the United States Department of Health and Human Services,

*Defendant.*

No. 3:20-CV-00687

(Judge Mariani)

(Magistrate Judge Carlson)

(Electronically Filed)

**DEFENDANT'S MOTION FOR PROTECTIVE ORDER**

Defendant Alex M. Azar II, Secretary of the Department of Health and Human Services, by and through his undersigned counsel, respectfully moves this Honorable Court for a protective order, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure. The reasons for this motion will be more fully set forth in the brief to be filed in accordance with Local Rule 7.5.

Respectfully submitted,

DAVID J. FREED  
United States Attorney

/s/ Eric S. Wolfish

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*Attorneys for Defendant*

Dated: September 3, 2020

**CERTIFICATION BY COUNSEL PURSUANT TO LOCAL RULE 26.3**

I, Eric S. Wolfish, hereby certify that, on September 2, 2020, I conferred with Plaintiff's counsel in a good faith effort to resolve by agreement the issues raised in this Motion without the intervention of the Court. Agreement could not be reached because Plaintiff's counsel refused to withdraw the Notice of Deposition of Alex Azar Pursuant to Rule 30(b)(6).

/s/ Eric S. Wolfish  
ERIC S. WOLFISH  
Special Assistant United States Attorney

Dated: September 3, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, a true and correct copy of the foregoing Motion for Protective Order was filed and served upon all counsel of record through the Court's CM/ECF system.

/s/ Eric S. Wolfish  
ERIC S. WOLFISH  
Special Assistant United States Attorney

Dated: September 3, 2020